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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 TOMMY GHOLSON,
16 Defendant.

Case No. 2:21-cr-00113-APG-EJY

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(Second Request)

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
19 Frierson, United States Attorney, and Bianca R. Pucci, Assistant United States
20 Attorney, counsel for the United States of America, and Rene L. Valladares,
21 Federal Public Defender, and Benjamin F. J. Nemec, Assistant Federal Public
22 Defender, counsel for Tommy Gholson, that the sentencing hearing scheduled for
23 January 31, 2023 at 1:30 pm, be vacated and set to a date and time convenient to
24 this Court, but no sooner than thirty (30) days.

25 The Stipulation is entered into for the following reasons:
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1 1. Defense counsel needs additional time to investigate and prepare
2 mitigation for Mr. Gholson's sentencing.

3 2. Mr. Gholson is not incarcerated and agrees to the continuance.

4 3. The parties agree to the continuance.

5 4. The additional time requested herein is not sought for the purposes
6 of delay, but merely to allow counsel for defendant sufficient time within which to
7 be able to effectively investigate and possibly litigate any issues.

8 This is the second stipulation to continue filed herein.

9 DATED this 23rd day of January, 2023.

10 RENE L. VALLADARES
11 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

12 By /s/ Benjamin F. J. Nemec

 By /s/ Bianca R. Pucci

13 BENJAMIN F. J. NEMEC
14 Assistant Federal Public Defender

 BIANCA R. PUCCI
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 TOMMY GHOLSON,

8 Defendant.
9

Case No. 2:21-cr-00113-APG-EJY

ORDER

10 The parties being in agreement and the ends of justice being best served by
11 the granting of the requested continuance:

12 IT IS THEREFORE ORDERED that the Sentencing currently scheduled
13 for Tuesday, January 31, 2023 at 1:30 p.m., be vacated and continued to March 7,
14 2023, at the hour of 1:30 p.m. in Courtroom 6C.

15 DATED this 24th day of January 2023.

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18 UNITED STATES DISTRICT JUDGE
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